

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

5 WAYMO, LLC,)
6 Plaintiffs,)
7 - vs -) Case No.
8 UBER TECHNOLOGIES, INC.,) 3:17-cv-00939
9 OTTOMOTTO LLC; OTTO)
10 TRUCKING, LLC,)
11 Defendants.)

24 JOB No. 2640097
25 PAGES 1 - 317

1	I read that correctly?	03:12p
2	A. Yes.	03:12p
3	Q. I'd like to ask you some questions about this	03:12p
4	bullet here. So when you wrote that he would	03:12p
5	bring filtered advice about what to try and	03:12p
6	not try, what does that refer to?	03:12p
7	A. Filtered advice to me was know-how. It's like	03:12p
8	which way to attack the mountain and he had	03:12p
9	been at this since I met him that day in the	03:12p
10	desert in 2004, multiple companies, multiple	03:12p
11	efforts. The first guy to send an autonomous	03:12p
12	car across the Bay Bridge, he knew a lot about	03:12p
13	autonomy, so he would bring filtered men, he's	03:12p
14	not going to bring direct advice from a prior	03:12p
15	company such as Google, but he would bring	03:12p
16	filtered to me, like you filtered up enough	03:12p
17	and then it's know-how.	03:12p
18	Q. So the second part here you write that is [REDACTED]	03:12p
19	[REDACTED]	03:12p
20	[REDACTED]	03:12p
21	[REDACTED] What does that refer to?	03:13p
22	A. [REDACTED]	03:13p
23	[REDACTED]	03:13p
24	[REDACTED]	03:13p
25	[REDACTED]	03:13p

1	[REDACTED]	03:13p
2	Q. So then the next bullet says worked for	03:13p
3	Velodyne for a spell, not sure about that	03:13p
4	except that he knows their IP. Did I read	03:13p
5	that correctly?	03:13p
6	A. Uh-huh.	03:13p
7	Q. What does that refer to?	03:13p
8	A. Just what it says, he worked for Velodyne I	03:13p
9	believe around 2005 he was a consultant or an	03:13p
10	employee, he sold sensors for them. And I	03:13p
11	didn't know much about his relationship with	03:13p
12	them, but he would certainly have known their	03:13p
13	IP given that he worked for them or was a	03:13p
14	consultant for them.	03:13p
15	Q. The next section here says warnings. The	03:13p
16	first one I think we talked about this	03:13p
17	earlier, heard bad things from Salesky, do you	03:14p
18	see that?	03:14p
19	A. Uh-huh.	03:14p
20	Q. So when you were talking earlier about what	03:14p
21	Mr. Salesky told you, you were mostly focusing	03:14p
22	on a conversation, an hour long conversation	03:14p
23	he had with you in either late January or	03:14p
24	early February; is that correct?	03:14p
25	A. Correct.	03:14p